

From: (b) (6)
Sent: Tuesday, September 06, 2016 4:32 PM
To: HarborComments
Subject: Re: Clean Up Portland Harbor
Attachments: 349010346427815746.pdf



Clean Up Portland Harbor

Letter

Dr. Ms. McCarthy, The proposed cleanup of the Portland Harbor is a big win for industry and a bad deal for the public. EPA's cleanup proposal tackles just 8% of a site area that is 100% toxic. A more aggressive plan is needed to prevent even more harm to human health and the environment. On behalf of all people who rely on the river for food, recreation, employment and culture, I urge the EPA to implement a plan that: Moves quickly and sustainably reduces contaminants causing harm to Willamette and Columbia River resources. Includes ongoing monitoring and cleanup upriver and downriver from the site. Contributes to healthy fish that are safe to eat for all people. Holds polluters accountable for creating a safer Portland Harbor. These elements get us closer to the plan our communities deserve. And I deserve a clean, safe Portland Harbor. *Submitted during the comment period between June 9, 2016 to August 8, 2016 regarding the EPA's Portland Harbor Feasibility Study and Proposed Plan.

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Portland OR, 97211
September 6, 2016

ATTN: Harbor Comments
US EPA, 805 SW Broadway, Suite 500
Portland, OR 97205

To Whom It May Concern:

It is irresponsible for the EPA to consider approving a cleanup plan that does not fully outline the methods of monitoring the “Enhanced Natural Recovery” (ENR) and “Monitored Natural Recovery” (MNR) sites. As long as the actions to be taken on these sites are not described, the plan is incomplete and should not be approved without further information.

To fully evaluate the proposed action, the plan should, at a minimum, include:

- The environmental variables to be monitored and the methodology to be used;
- A schedule of environmental sampling, accounting for seasonal and environmental variation, to ensure that the expected variance in response variables is accounted for and can be incorporated into the final analysis;
- A statistical design to monitor if actual changes in the chosen metrics, outside of natural variation, are occurring within the site. There are numerous designs applicable, however, the BACI (Before-After-Control-Impact) may be the most useful when considering both the MNR and Enhanced Natural Recovery (ENR) sites;
- A definition of “recovery” or “failure” that incorporates changes over time in the monitored environmental variables. This definition should also include a proposed timeline in which these desired outcomes would be observed if the plan is working, and;
- A defined timeline and response if MNR sites are not recovering as expected or desired, wherein they could be converted to ENR sites to meet the goals of the Superfund Proposed Plan within the proposed timeline.

Without these components of the cleanup included in the plan, the Portland Harbor Superfund Site may be locked into a plan that does not adequately monitor the changes in the river as the cleanup process proceeds. The importance of these details cannot be overstated when it comes to determining the process as “working”, “failing”, or “finished”. I hope that the EPA will reevaluate the proposed plan to ensure that the cleanup of Portland Harbor moves forward using the best available science rather than the prevailing economic or political conditions.

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